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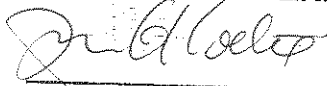
February 15, 2022

Via ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
599 Pearl Street
New York, New York 10007

APPLICATION GRANTED

SO ORDERED



John G. Koeltl, U.S.D.J.

2/15/22

Re: *Ms Dancy a/k/a Dena Wallace v. Westchester ALP Management, LLC, et al*
Civil Action Number: 1:21-cv-03866-JGK

Your Honor:

We represent Plaintiff in the above-referenced matter. This letter-motion is a joint request for an extension of the fact discovery deadline. The initial deadline to complete fact discovery was November 19, 2021, and Your Honor granted one prior request for extension made by Defendants, which extended the deadline to February 21, 2022.

Since Your Honor granted Defendants' prior request for extension, the Parties have exchanged most written or documentary discovery and are engaging in discussions regarding supplemental production. Further, Plaintiff's deposition has been taken and the Parties are working to schedule the depositions of Defendants' witnesses.

The Parties jointly request this extension as we believe that there is opportunity for settlement and are actively working towards resolution in this matter. Defendants indicated by letter to Your Honor dated August 17, 2021 that Defendants preferred to remove the case from the Mediation Program at that time, but were open to deferring mediation to a later date. The Parties agree that mediation at this stage would be beneficial, and request that this matter be referred to the Mediation Program prior to any deadline for the completion of fact discovery.

For the foregoing reasons, the Parties jointly propose the following schedule, pursuant to this matter's referral to the Mediation Program:

- Completion of Fact Discovery: April 22, 2022
- Deadline to submit Expert Disclosures: May 6, 2022
- Completion of Expert Discovery: July 1, 2022

- Dispositive Motions due by: July 29, 2022
- Joint Pre-Trial Order due by: August 19, 2022, or three weeks after decision on any dispositive motions
- Ready for Trial by: September 9, 2022

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/Hannah Kucine
Hannah Kucine, Esq.
Dorina Cela, Esq.
Attorneys for Plaintiff

cc: Elizabeth McKenna, Esq. (*via ECF*)
James F. Horton, Esq. (*via ECF*)
Attorneys for Defendants